



Garson, Segal, Steinmetz, Fladgate LLP

Partners

Robert Garson ♦
Thomas Segal ^
Michael Steinmetz ∝ *
Chris Fladgate °

Additional Bar Memberships

♦ England and Wales
^ Paris
* New Jersey
∝ Patent Bar
° Victoria (Australia)
▽ Israel

Of Counsel

Stephen Greenwald
Timothy Kendal ♦
Ilan Ben Avraham ▽
John Lane ∝

Tel: +1 (212) 380-3623

Fax: +1 (347) 537-4540

Email: rg@gs2law.com

Hon. Valerie E. Caproni,
United States District Judge,
United States Courthouse,
40 Foley Square,
New York, NY 10007-1312

July 9, 2014

Re: G31000 North America, Inc. et al v. Paris et al, 1:14-cv-03885-VEC

Dear Judge Caproni,

We represent G31000 North America, Inc, Allen Gluck and Alexis Dali (“Plaintiffs”) in the above-referenced case. We write in response to the letter of defendants Christopher Paris and Oxebridge Quality Resources International, LLC (“Defendants”) dated July 9, 2014 (Docket Document No.9). We request that the Court schedule a telephone conference, at its convenience, to arrange for an available date for Plaintiffs’ Order to Show Cause for temporary restraints and submissions on Defendants’ request for an adjournment.

On June 24, 2014, we proactively sought to constructively engage with prospective opposing counsel (letter attached hereto as Exhibit A). There was no response.

Yesterday, opposing counsel’s law clerk called our office asking for an adjournment of the scheduled date for an intial pretrial conference but gave no proper reasons, other than inability to draft a joint letter. We informed him that we needed to take instructions from our client.



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This morning, Defendant's filed a motion to dismiss and in response to a chaser email we informed Mr. Wohlsifer, that we did not consent as we will be seeking temporary relief from the Court and invited him to join a call today at 12:45. (Email attached as Exhibit B). There was no response other than Mr. Wohlsifer filing a letter with the Court for an adjournment.

We anticipate, the Order to Show Cause for temporary restraints being filed later in the day and in our view the Court and counsel would benefit from the Court's guidance

Respectfully submitted

A handwritten signature in dark ink, appearing to read "Robert Garson", with a stylized flourish at the end.

Robert Garson, Esq.



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Fax: +1 (347) 537-4540

Email: rg@gs2law.com

William R. Wohlsifer,
William R. Wohlsifer, PA
1100 E Park Ave, Suite B
Tallahassee, FL 32301

June 24, 2014

Via email to william@wohlsifer.com
and Fax to 866-829-8174

Re: G31000 North America, Inc. et al v. Paris et al
Case No. 1:14-cv-03885-VEC

Dear Mr. Wohlsifer,

We are instructed by the Plaintiffs in the above referenced action and understand that your firm attempted to appear in this matter yesterday on behalf of either or both of the defendants.

Although your firm is not yet officially on the docket, out of an abundance of caution arising from NYRPC Rule 4.2, and as a courtesy, we write to address an email (attached) sent to our clients by Christopher Paris ("Paris"). If you do not represent either of the defendants, please make us aware so we can make contact accordingly.

Ordinarily, the existence of a lawsuit gives a party pause for thought, however should Paris compound his position and continue to publish defamatory statements we will be compelled to request preliminary relief from the Court.

We are instructed:

- (i) No "spam software" was utilized by plaintiffs to send emails;
- (ii) All contacts that received emails had the ability to opt-out (although Paris apparently removed this opt-out button when forwarding the alleged "spam" to our clients);
- (iii) No contact information has been "harvested";
- (iv) There has been no violation of the CAN-SPAM Act;
- (v) There have been no violations of LinkedIn terms and conditions.



Continuation Page

Unfounded allegations of violations simply do not warrant a response. If either of your clients have specific information regarding an alleged violation, you are welcome to so provide so that so we can make representations accordingly.

As your clients are undoubtedly aware, publishing unfounded allegations brought this matter to Court, it might be that with the benefit of counsel's salutary advice, extensive motion practice might be averted.

Yours sincerely,

A handwritten signature in dark ink, appearing to be "RG", with a small dot at the end.

Robert Garson

Encl(s).



From: Robert Garson rg@gs2law.com
Subject: Re: G31000 v. Oxebridge 1:14-CV-3885 (VEC)
Date: July 9, 2014 at 10:42 AM
To: william@wohlsifer.com
Cc: Michael Steinmetz ms@gs2law.com, Matt Knoll LawClerk@infringement-attorney.com

Dear Bill,

a) I am deeply surprised that as of yesterday, your office did have the courtesy to tell me that a motion to dismiss was to be filed, that may have impacted on my decision, and failure to do so, in my opinion was disingenuous.
b) Therefore, I do not agree to an adjournment to the 25th.
c) Your officer entered the case yesterday, and did not respond to my letter of June 24, 2014 confirming whether it was actually going to appear, the day after it tried to file your appearance. Your office also chose not to correct the defect until yesterday. June 23, 2014 is the same date the Court scheduled the initial pre-trial conference. That indicates to me that your office had access to the docket, absent being told otherwise. For your office to claim lack of knowledge of the scheduled date, in my view, is again disingenuous.


Because of the continued actions of the Defendants, we shall be filing for a Temporary Restraining Order and Preliminary Injunction. The Court rules state that you and I must confer as to whether the Defendants will consent to Temporary relief. I am available to speak to at 12:45 est.

Yours

Rob

Robert Garson
Barrister & Attorney
Managing Partner
Garson, Segal, Steinmetz, Fladgate LLP
164 West 25th Street, Suite 11R
New York, NY 10001
+1 (212) 380-3623

 www.gs2law.com

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This message and any attachment are confidential and may be privileged or otherwise protected from disclosure. If you are not the intended recipient, please email the sender and delete this message and any attachment from your system. If you are not the intended recipient you must not copy this message or attachment or disclose the contents to any other person.

On Jul 9, 2014, at 10:15 AM, Matt Knoll <LawClerk@infringement-attorney.com> wrote:

Hello Mr. Garson,

I never received a response to our conversation yesterday. I attempted to call you this morning but got your voicemail. I have to file the letter motion for adjournment today the earliest date we could have the conference and get the joint letter in on time to the court pursuant to the terms of the Notice is the 16th and from our conversation yesterday I am under the impression that you were available that day. I also contacted the judicial assistant for Judge Caproni and they prefer these to be scheduled on Fridays. Mr. Wohlsifer is not available 18th so I will be purposing the 25th in addition to the 16th. We are not committed to these dates and are willing to schedule at your and the courts convenience.

committed to these dates and are willing to schedule at your and the court's convenience.

I spoke with Mr. Wohlsifer and we do not want to ask the court to take less time in its review. Although I would like your consent on a date prior to filing, not being notified about the Pretrial Conference has put a strain on time. If I do not receive a response from you by 11:40 am EST I will file the letter motion noting you have not consented. Regardless we would like to begin getting the joint letter together.

Please call or email as soon as possible.

Thank you,

Matt Knoll | Law Clerk | William R. Wohlsifer, PA
1100 East Park Ave, Ste B | Tallahassee, FL 32301
Tel: (850) 219-8888 | Fax: (866) 829-8174
LawClerk@infringement-attorney.com | www.infringement-attorney.com